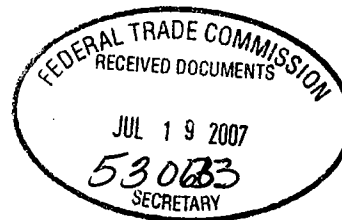




American
Dental
Hygienists'
Association

444 N. Michigan Ave.
Suite 3400
Chicago, IL 60611
800/243-2342
P: 312/440-8900
F: 312/467-1806
www.adha.org



July 18, 2007

By Electronic Mail to
consentagreement@ftc.gov

Honorable Deborah Platt Majoras
Chairman
U.S. Federal Trade Commission
600 Pennsylvania Avenue, NW, Room 135-H
Washington, DC 20580

RE: Support for Proposed Consent Order in the Matter of South
Carolina State Board of Dentistry, Docket No. 9311

Dear Chairman Majoras:

I write on behalf of the American Dental Hygienists' Association (ADHA). ADHA is the largest organization representing the nation's more than 120,000 dental hygienists. Dental hygienists are preventive oral health professionals who are licensed in each of the fifty states.

ADHA strongly and enthusiastically supports the proposed Federal Trade Commission's (FTC) consent order with the South Carolina State Board of Dentistry. The FTC rightly recognized that the South Carolina State Board of Dentistry unlawfully restrained competition by re-imposing through emergency regulation a requirement that a dentist examine every child before a dental hygienist could provide preventive care to children in schools. The South Carolina State Board of Dentistry adopted this emergency regulation despite the fact that the South Carolina legislature had just eliminated a statutory requirement that a dentist examine each child before a hygienist could provide dental care in schools.

The Dental Board's actions hindered competition and deprived thousands of South Carolina's school children, particularly economically disadvantaged children, of the benefits of on-site preventive dental services, including cleanings, sealants, and fluoride treatments. This audacious restriction of competition clearly contravened the will of state lawmakers and effectively impeded access to oral health services for school children.

